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Mr Stuart Malcolm
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26 April 20123

Sent by e-mail to: planninginfo@midsussex.gov.uk

Dear Mr Malcolm,

Planning application Ref DM/23/0827: West Hoathly Brickworks, Sharpethorne, RH19 4PB

I am writing on behalf of CPRE Sussex (CPRESx), the Sussex countryside charity. I am writing to let you know our views on the countryside and sustainability implications of this planning application, and why we would support a decision by your Council to refuse this application as being, overall, contrary to your Council's District Plan policies, to West Hoathly's Neighbourhood Plan (WHNP) and to national planning policy.

CPRESx's support for sustainable brownfield site redevelopment

CPRESx wholeheartedly supports the primary reuse of suitable brownfield sites over greenfield land for needed housing or other development, as in general this is likely to involve a sustainable solution to the re-use of unproductive (usually urban) land and the delivery of needed housing.

We also support the principle underlying your Plan policy SA34 for the redeployment of ex-employment sites preferably for alternative business use or, where that is demonstrated not to be feasible, for housing or other use. (We have not seen it demonstrated that there is no viable alternative employment use in this case).

But the fact that a site is a brownfield or redundant ex-employment site does not mean that any proposal that may come forward for its redevelopment will necessarily be sustainable or is appropriate and to be welcomed. Each application is of course to be considered on its own merits in terms of its sustainability and consistency with applicable local plans and national planning policy including the National Planning Policy Framework (NPPF).

Summary of the reasons for CPRESx submission that this application should be refused.

From CPRESx's perspective this application is plainly not compatible overall with the District or WH Neighbourhood Plan; nor with national policy. For the reasons we expand on below, it is not sustainable development or policy compatible because

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President: Lord Egremont

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- The scheme proposal fails the fundamental principle that any new permitted development should contribute to the achievement of sustainable development (NPPF para 7). That principle is cemented into your Council's District Plan as a core part of the Plan's vision, objectives and policies.
- it ignores NPPF para 176-177, governing development within AONBs which requires that development be limited in scale and extent, and that major development within the AONB should be refused absent both exceptional circumstances and a public interest justification outweighing the public interest in the High Weald's protection;
- this scheme involves major development with no justifying exceptional circumstances;
- it constitutes a considerably over-sized development for local needs, and therefore is not limited in scale or extent; nor is it allocated in the District Plan for development of this scale;
- the SANGS proposals risk harming the SSSI and ancient woodland within and around the overall site, contrary to NPPF paras 174 and 180(c)-(d) and to District Plan policy DP38;
- it is in a location which will leave all residents car dependent for services, schools, shops, work and play reliant on already congested minor roads, with virtually no sustainable transport alternatives. As such it is not sustainable from a transport standpoint contrary to your Plan policy DP21 and is incompatible with policy to reduce greenhouse gas emissions;
- the fact that the scheme involves gross over-development in a remote location it will, in our view, cause a degree of harm to the AONB. The law requires great weight must be given to any harm caused to the High Weald locally or overall, irrespective of the degree of that harm;
- such limited benefits as this particular proposal offers for redeveloping this brownfield site do not override its very significant disbenefits, nor its inconsistencies with national and local plan policies.

It is material and helpful that your Council has a current Plan and a more than 5 year housing land supply, with sites already allocated to meet in full the District Plan's housing requirement for the full Plan period to 2031. This West Hoathly Brickworks site not being one of those allocated sites. This removes any pressure that there might otherwise be to approve this unsustainable application for 108 homes as being necessary to deliver the District's housing quota or as the best way to bring a brownfield site back into use.

Alternative option

We respectfully suggest that your Council should be working with West Hoathly Parish Council and others to bring forward an alternative way to bring back this brownfield site into use via a sustainable plan that respects the site's sensitive location. That means that it should be of limited scale and extent, landscaped, and reflect local needs by combining new facilities suitable for a variety of small-scale local business enterprises (providing on-site employment opportunities for local people) and rural exception site affordable housing (if need be using new compulsory purchase powers that the Government has promised to bring forward). The focus on affordable homes is supported by the WHNP vision that identifies the need for smaller and affordable housing within the Parish.

Any such scheme should also be compatible with the protection of the SSSI and ancient woodland, and with the existing restoration scheme for those areas.

Our objections explained.

(1) High Weald AONB conservation

AONBs and other designated landscapes are recognised within the NPPF (para 176) as having the highest status of protection in law from large scale and other inappropriate development on account of special

landscapes and natural beauty. The conservation and enhancement of wildlife and cultural heritage within them are also to be treated as important considerations in planning decisions. This protection extends to the whole designated area (and beyond to the AONB's setting), not merely to the pretty bits. It is recognised in paras 176 and 177 that any development within an AONB must be limited in scale and extent, and that major development within an AONB would not be sustainable having regard to the public interest in conserving and enhancing the AONB's purposes.

District Plan policy DP16, which gives local effect to NPPF paras 176-177, only supports suitable small-scale development within the High Weald, and mandates that "*permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.*" No ifs; no buts; no brownfield site exception.

As the protective purpose of national and DP16 policies is to conserve and enhance the High Weald's precious natural landscape, even limited harm from a development must by law be given the great weight that policy requires.

Any argument that the delay in finalising your 5 year District Plan Review would render DP16 out of date and meriting less weight in planning terms would surely fail given that DP16 directly reflects and implements national planning policy and NPPF paras 176- 177.

There can be no possible doubt that, objectively considered, this application would involve major development within the High Weald AONB. None of the exceptional circumstances listed in para 177 applies (or is claimed to apply); nor is there the required public interest justification sufficient to trump the statutorily recognised public interest in conserving and enhancing designated landscapes.

In many ways this application mirrors that made as part of the Sites Allocations DPD to allocate a site on the Ardingly Showground (within the High Weald) for 70 (initially 100) houses. We ask you to read the appended Planning Inspector's final report¹ conclusions on that proposal. In summary, he concluded that:

- National policy, as expressed in NPPF para 176, requires great weight to be given to conserving and enhancing landscape and scenic beauty in AONBs;
- Objectively and fairly considered, CPRESx's case made at the draft SADPD's examination was correct, and, despite NPPF footnote 60, your Council was wrong to treat 70 new homes as minor development. In the context of that site any development should be for no more than 35 dwellings in order to be compatible with your District Plan policy DP16 to limit High Weald development to small scale projects appropriate to the location involved;
- Your Council was correct to conclude that no exceptional circumstances existed to justify major development;
- Ardingly, like Sharpethorne, is classified as a medium sized village providing limited services where small scale growth would, consistently with the District Plan, be acceptable in principle and where the local community's own housing needs cannot be met outside the AONB;

¹ Report dated 30 May 2022 by Mike Fox to Mid Sussex District Council on the Examination of the Mid Sussex Site Allocations Development Plan Document.

- The building of 70 homes in Ardingly (108 in Sharpethorne) would undoubtedly exceed what is locally needed and be disproportionate to the size of the settlement ,which only offers a very limited range of services and a poor bus service;
- The District Plan (table, page 37) showed a 2017 residual housing need for Ardingly of 29 houses (since reduced);
- Despite concluding that the proposed site landscaping strategy was robust and could ensure that landscape and visual effects could be minimised, nonetheless it would impact adversely on the site’s setting, and on the visual containment of the area from the wider AONB landscape; and these facts supported his conclusion that a 70 home scheme would involve major development and be harmful;
- Given the above the Inspector concluded that no more than 35 new homes should be built in order to avoid harm to the High Weald AONB and required the proposed site allocation to be reduced from 70 to 35 houses (Policy SA25).

We appreciate that each site must be considered on its own facts in terms of potential development impacts on its landscape character. There is a strong argument to be made that the West Hoathly Brickworks site is more landscape sensitive and environmentally sensitive than the Ardingly site given the presence here within the overall site area of both ancient woodland, an SSSI and other special habitats. We expand on that aspect below.

In our opinion, the Inspector’s conclusions in the Ardingly Showground case on what constitutes major development and that the permissible small scale housing level should reflect local community need have a direct bearing on the present application: Sharpethorne and West Hoathly are, like Ardingly, both category 3 rural villages in your District Plan. All three villages have similarly limited shopping opportunities, a poor bus service, and all lack any local health or bank services. There is no school beyond primary age. The nearest railway station is over 8.5km away². Whereas your District Plan recorded Ardingly as having a modest residual housing need as at 2017, the same table shows Sharpethorne as having already significantly exceeded its minimum requirement and West Hoathly as having a residual need (in 2017) of only 8 dwellings.

A scheme for 108 dwellings in Sharpethorne unquestionably involves major development (arguably by a factor of at least three). It bears no relation at all to the Plan requirements to satisfy local community need. Nor is it justified by a need to catch up on an overall District housing supply shortfall.

There are multiple planning decisions that give effect to the NPPF requirement to refuse planning permission for major development within designated landscapes. The most recent – also involving the High Weald AONB in Tunbridge Wells district – being PINS appeal ref: APP/M2270/V/21/3273015. That case also examined the limited scope to plead exceptional circumstances and concluded that even TWBC’s lack of a 5 year housing land supply did not count.

² We disagree with the applicant’s claim (DAS para 2.5) that “*Sharpethorne is served by a good level of services and amenities within walking distance of the site*”.

In view of the above we consider that the inevitable conclusion is that your District Plan policy DP16, read in the context of NPPF paras 176 and 177, requires this application to be rejected as unsustainable major development within the High Weald AONB.

(2) Harm to the landscape and countryside

We consider that the view of the High Weald AONB Unit will be very important in addressing this aspect of the planning application (including as to its compatibility with the High Weald Management Plan). All the more so as development schemes within the High Weald should be landscape-led. At the time of writing we have not seen any advice that they may have given. We note that the most recent (13 April 2023) advice from your landscape consultant makes no reference to the fact that the application involves major development within the High Weald AONB and your duty to refuse permission for major development; nor to the fact that great weight must be given to avoiding even moderate harm to the AONB.

Whilst the site is in a shallow hollow, it is visible from a number of more elevated viewpoints. The extent of the new development's visibility would be greater than at present because the proposed buildings, at up to 3 storeys, will be higher. The housing – a large estate - would also be full frontal visible from the public rights of way along the side of the site, to users of the proposed SANGS and travellers using the Bluebell Railway to enjoy the High Weald's beauty.

We note that WHNP (WHP1 and WHP4) expressly seeks to maintain the integrity of the area's characteristic open vistas, which the development, as proposed would not do. Nor would it be compatible with the WHNP for the site to be hidden behind new high hedging or interplanted trees (which would, in any case, take years to mature).

Even if you were to conclude that the proposed site landscaping strategy was robust and could ensure that landscape and visual effects could be minimised, nonetheless if it would impact adversely on the site's setting (even to a less than significant degree) and on the visual containment of the area from the wider AONB landscape, the scheme should not be permitted based on your District Plan policy DP16 and the principle established by your SADPD examination in respect of the Ardingly Showground site.

By reason of the scale of the proposed development the level of human and vehicular traffic would also be considerably greater, putting the surrounding High Weald area and its ecology under greater pressure of disturbance. As the conservation and enhancement of wildlife and cultural heritage within AONBs are also stated in NPPF para 176 as being important considerations, this is a further indication of unacceptable harm that the scheme would cause.

(3) A SANGS risks ecological harm and is not a benefit of the applicant's proposal

The applicant's Design & Access Statement (DAS) (p8) identifies that *"The land hatched in purple, measuring 29 acres (11.74ha) [i.e. the overall site] is subject to Restoration Order to deliver a programme of Restoration Works which have been approved by the statutory regulators following cessation of quarrying works. Within this land is an SSSI, areas of ancient woodland, areas of established reptile habitat and a series of drainage ditches and ponds."*

The SSSI is described within its citation as a Geological Conservation Review site that is *"a key locality for studies of the Wadhurst lagoonal/lacustrine environment. In particular, it yields evidence important in the*

following disciplines: palaeobotany (spores, upstanding plants), palaeozoology (ostracods, bivalves, gastropods, fish), clay-mineralogy, geochemistry (ironstones, stable C-isotopes in aragonitic Neomiodon valves). All these are important for interpreting environmental conditions at the northwestern extremity of the Wadhurst Clay outcrop.”

Your District Plan policy DP38

- requires development schemes to enhance biodiversity
- provides that any new development must “*avoid damage to, **protect and enhance** [our emphasis] the special characteristics of SSSIs and ancient woodland” and “other areas identified as being of nature conservation or geological interest”.*
- requires an assurance that “*geodiversity will be protected by ensuring development prevents harm to geological conservation interests, and where possible, enhances such interests.”*

Your DP38 policies are further reinforced by NPPF paras 180((a) – (c), to which full regard must be had in evaluating the proposal’s impact on the existing special habitats within the development site.

These are the strict tests against which the impact of the proposed development (especially the SANGS development) on the non-housing area of the site must be assessed. They are tests that we consider that the proposal is inevitably bound to fail, especially when, in respect of the woodland, it is assessed in conjunction with DP37.

The absence of any relevant map within the DAS makes it impossible to identify the extent to which the SSSI overlays the overall site or to be sure that it does not include any part proposed within the area proposed for development. Nor are the ancient woodland or established reptile habitat boundaries marked anywhere.

An established, relatively undisturbed, natural habitat area of special quality that incorporates, or even abuts, an SSSI, areas of ancient woodland and an established reptile habitat is an appalling location to consider siting a SANGS. The DAS offers no explanation as to how any of the features are to be protected from harm from the development of the SANGS or the additional traffic from humans and dogs inherent in the purpose of encouraging SANGS use.

The building of all the (cindered or tarmac-ed?) pathways, car park etc and its much more regular use will radically disturb that existing habitat and the biodiversity within it, as well as the SSSI’s unique geological and geomorphological features. The character of that settled natural environment will be changed into parkland, and rendered unsuitable for much of the nature now within it. The zig-zag route required by the walking track (as illustrated on DAS p.65) to achieve even a 2.3km distance is as tortuous as a coiled boa constrictor, and demonstrates that none of this precious area will be undisturbed by SANGS’ users or their dogs; and that inevitable dog fouling is bound to disrupt the soil, reptile pond and plant ecology. The proposers offer no explanation as to how the reptiles and other creatures, or the ancient woodland, will be protected from the SANGS (or housing) development works or its subsequent use. Nor how the benefits of the existing Restoration Order will be achieved and maintained long term.

The proposal is therefore in conflict with your District Plan policies DP37 as regards the importance of protecting ancient woodland; and with DP38 as regards the SSSI and all the other biodiversity. If you

accept that significant harm to the biodiversity on site cannot be avoided or adequately mitigated in the course of the construction or operation of the SANGS then NPPF paras 180)(a) - (c) require the scheme to be refused.

In any case, we can see absolutely no benefit, and the risk of considerable harm, from the conversion of the existing ecologically, geologically and geomorphologically important habitat within the site into a SANGS within the High Weald AONB itself. With so much natural green space and numerous PROWS in the immediate vicinity of Sharpethorne and West Hoathly for new residents and others to enjoy for their wellbeing, a SANGS within the site performs no valuable function that justifies the damage that it would cause to the habitats, creatures and ancient woodland within it.

Nor, in our view, can the applicant justifiably claim that its suggested SANGS will provide a biodiversity benefit that justifies this proposed development given that the land is already subject to an existing Restoration Order to deliver a programme of restoration works that has already been approved by the relevant regulatory authorities as appropriate for the site. Those works do not envisage the need for a SANGS in order to effect the restoration required.

All in all, on analysis, the environmental benefits claimed by the applicant in the creation of their SANGS are largely illusory.

(4) *Transport non-sustainability*

Sharpethorne is a relatively remote location accessible only via minor C-roads. East Grinstead, the closest town, is 8km away (nearly all of on minor roads). With an absence of local shops or other facilities, with no trains and few buses, all residents would be essentially car dependent and would add considerable additional traffic onto the already busy surrounding rural roads (all of them C roads). Safe cycling opportunities are very limited given the narrowness of all local roads, the absence of dedicated cycle routes and the hilly topography; and we note that the application offers no new safe cycling initiatives. It cannot be sustainable to impose such a large-scale, car-dependent development, however energy efficient the individual buildings, on such a remote location. The proposal does nothing to promote sustainable transport: quite the opposite.

So, from a transport standpoint the proposal is incompatible with your Plan policy DP21(Transport) because it fails to meet DP21 requirements, amongst other things, for:

- development schemes to be sustainably located to minimise the need for travel;
- appropriate opportunities to be provided to facilitate and promote the increased use of alternative means of transport to the private car;
- appropriate mitigation to support new development on the local and strategic road network;
- the avoidance of severe additional traffic congestion, individually or cumulatively, and
- the avoidance of harm to the special qualities of the High Weald AONB through its transport impacts.

The scheme is also patently incompatible with WHNP vision objective *“to reduce significantly the negative impacts of the current C319 road traffic usage pattern on the lives of all residents.”*

(5) *Design issues*

Whilst the density of development proposed within the site (at 23.5 dwellings per ha) is arguably relatively consistent with good design principles for this location, the size and massing of individual buildings within the site is not, in our view. Nor is adequate respect paid to the context of the wider High Weald surroundings. The buildings as described in the Design & Access statement are depressingly generic, lacking individual distinctiveness or appropriate character; and the High Weald is no place for three storey (or even 2.5 storey) housing that will increase the surrounding area from which the development would be visible. Overall, despite the green space proposed within the development, the design disrespects the special character of the area which would already suffer from the sub-urbanising impact of such a large development.

In our view, therefore the overall design fails to reflect the expectations of either your Council's or the High Weald's Housing Design Guide.

We note that, in the recent called-in appeal case involving Tunbridge wells BC cited above the Secretary of State rejected a similarly large-scale development proposal within the High Weald AONB, inter alia, on the grounds that it was not sufficiently landscape-led and was of a generic suburban nature which did not reproduce the constituent elements of local settlements. This application is, in our view, open to the same criticism; its bland design cannot be considered as providing an enhancement benefit to the High Weald.

Conclusion

For these reasons, and despite our general strong support for brownfield redevelopment, we consider that this is an inappropriately over-large and unsustainable scheme for this site, and that it is incompatible with applicable local plan and national policies and design guides. It's supposed benefits have been oversold by the applicant. That is why we would support a decision by your Council to reject this application. We have suggested above our ideas for the type of redevelopment that would be appropriate and sustainable.

Yours sincerely,

Michael A. Brown

on behalf of CPRE Sussex, the Sussex countryside charity.

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Appendix – Extract from the Report dated 30 May 2022 by Mike Fox to Mid Sussex District Council on the Examination of the Mid Sussex Site Allocations Development Plan Document.

“Policy SA25 - Land West of Selsfield Road, Ardingly – 70 dwellings

192. This allocation for 70 dwellings in the submitted Plan is located within the village of Ardingly, which is ‘washed over’ by the High Weald AONB. National policy, as expressed in paragraph 176 of *the Framework*, requires great weight to be given to conserving and enhancing landscape and scenic beauty in AONBs, which have the highest status of national protection in relation to these issues. Allocation SA25, and in particular the proposed quantum of the housing proposed, was considered at some length in written representations and at the examination hearings.
193. In particular, it was debated whether, in the light of national policy as expressed in paragraph 177 of *the Framework*, the allocation could be considered to be minor or major development within the AONB; if the allocation is considered to be major, there would need to be exceptional circumstances which would justify the amount of housing proposed in policy SA25 and whether the development would be in the public interest.
194. Footnote 60 of *the Framework* addresses the question of whether a proposal is major development. It states that whether a proposal is major development: *“is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”*
195. District Plan policy DP16 sets the strategic parameters for development within the High Weald AONB. It makes provision for small scale proposals which support the economy and social well-being of communities within the AONB, and which are also compatible with the conservation and enhancement of natural beauty. The context for Mid Sussex is that the AONB covers most of the northern part of the District, with the exception of an area which includes East Grinstead, Crawley Down and Copthorne, and that it is clearly important to enable the organic growth of settlements within the
196. Ardingly is one such settlement within the AONB, identified as a Category 3 settlement, i.e. a medium sized village, which provides for limited services, and where small scale growth would be acceptable in principle. The Mid Sussex District Plan IR also states that some settlements: *“lie within the AONB and may be appropriate for modest housing schemes”*⁴⁴. Clearly in a settlement like Ardingly, there is no scope for meeting local needs in close proximity to the settlement outside the AONB.
197. The Council’s justification for its allocation of 70 dwellings in policy SA25 is set out in its Major Development in the High Weald AONB Topic Paper⁴⁵. This paper explains that the original total of 100 dwellings to be allocated at Ardingly in the Regulation 18 consultation version was considered to be major development due to its scale and that development of the whole site would not fit the historic settlement pattern of Ardingly, which means that there would be an adverse impact on the High Weald AONB. The Council’s assessment also concluded that there would be no exceptional circumstances for this development in the AONB at Ardingly because there are alternative locations outside the AONB.

⁴⁴ Mid Sussex District Plan IR para 53.

⁴⁵ MSDC Site Allocations DPD-Major Development in the High Weald AONB Topic Paper; December 2020 [Examination Document Topic Paper 1].

198. In the revised policy SA25 in the submitted Plan, the overall size of the site remains the same as in the Regulation 18 version. However, the proposed built development is now limited to the eastern section of the allocation, with the western part to remain as open space, along the line of an old field boundary, which the Council considers is more in keeping with the historic settlement pattern of Ardingly than in the original allocation. The Council argues that the reduced size of the allocation to 70 dwellings in the submitted version is not regarded as major development.
199. I agree with the Council that no exceptional circumstances exist to justify a major housing development at Ardingly, primarily because of its location within the AONB and its modest settlement size. I therefore have to consider whether 70 dwellings can be justified as minor development, especially bearing in mind the guidelines in footnote 60 of *the Framework* and policy DP16 of the District Plan. I also agree with the Maurici Opinions⁴⁶, which not only highlight national policy, including the above-mentioned footnote 60, but also refer to the High Court challenge in *Aston v SSCLG* [2013], where it was held that the word ‘major’ has a natural meaning in the English language, albeit not one that is precise⁴⁷.
200. In terms of context, there is no doubt that the quantity of the allocation, at 70 units, exceeds what is needed locally in Ardingly. The Category 3 village has a small population, estimated at 1,910 inhabitants, and policy SA25, representing a 15% increase in the number of dwellings within the built-up boundary of the settlement, would not be proportionate to the size of the settlement, which only has a modest range of services and poor bus connections.
201. The overall housing requirement for the District, shown in the table at page 37 of the District Plan, indicates a minimum residual housing requirement (accounting for commitments and completions) for Ardingly of 29 dwellings. This figure is likely to have been reduced further through other commitments and completions in the intervening three plus years since the table was printed. I also note that the Ardingly NP indicated a need in the settlement of 37 dwellings to 2031, a figure which is also likely to have fallen in the intervening years. Based on the above information, it is my view that the quantum of development on allocation SA25 at Ardingly should not exceed 35 dwellings, i.e. half the number of homes proposed in the submitted Plan.
202. The Council and the site promoters argue that the visual impact of the proposal for 70 dwellings in the submitted policy SA25 on the AONB outside the village would be minimal, especially in the context of a robust landscape strategy. I have read and studied the Landscape and Visual Appraisal (LVA) which has been commissioned by the site owners and site promoters⁴⁸. I largely agree with the LVA descriptions of the landforms, vegetation and tree cover, and the overall conclusion that a robust landscape strategy could ensure that landscape and visual effects are minimised.
203. However, it is also true that the allocation is located on a prominent, open plot with some visibility from areas outside the village, and in particular from the Ardingly Conservation Area to the west and south- west and the open countryside views towards the Ardingly Reservoir further to the

⁴⁶ Major Developments in National Parks by James Maurici QC, Landmark Chambers, which includes the so-called Maurici Opinions.

⁴⁷ *Aston v SSCLG* [2013] EWHC 1936 (Admin) – judgment by Wyn Williams J.

⁴⁸ Huskisson Brown Associates: Landscape and Visual Appraisal relating to Land West of Selsfield Road, Ardingly, West Sussex, on behalf of Charterhouse Strategic Land and The South of England Agricultural Society; May 2020 [Examination Document SA25.4].

west, both of which I observed on my site visit⁴⁹. Whilst I do not agree that the allocation would result in the suburbanisation of the village, I do consider that it would impact adversely on its semi-rural setting, and on the visual containment of the area from the wider AONB landscape. In my view, these considerations render the proposal for 70 dwellings ‘major’ development in my understanding of its natural meaning in the English language.

204. **MM1** therefore reduces the housing total for policy SA25 from 70 to 35 dwellings, at the same overall density as in the submitted Plan (i.e. about 20 dph), located at the eastern end of the original SA25 allocation, to enable the proposal to sit within the proper context of a small settlement in the High Weald AONB, in accordance with the requirements of national policy and policy DP16 of the District Plan. Allocating a smaller scheme to the east, nearer to Selsfield Road would increase the distance from both the Conservation Area and the wider AONB landscape to the west, whilst at the same time reducing its visual impact on the village and the landscape. These changes are necessary for policy SA25 to be consistent with national policy, both in relation to the scale of the village and its limited sustainability, and also in relation to its visual impact on the AONB.
205. The Council’s updated housing land supply trajectory⁵⁰ points to policy SA25 being implemented within years 6-10 and I have no reason to take a different view.”

⁴⁹ The route of the partially accompanied site visit is indicated on the map submitted in response to Action Point 9, which shows the relationship of the allocation SA25 (edged red) to both the Conservation Area and the countryside to the west.

⁵⁰ Examination Document MSDC–06b.